



Chairperson: Bob Wyatt, NW Natural
Treasurer: Fred Wolf, Legacy Site Services for Arkema

April 16, 2012

Lori Cora
US EPA
1200 Sixth Avenue, Suite 900
ORC-158
Seattle, Washington 98101

Chip Humphrey
US EPA
805 SW Broadway, Suite 500
Portland, Oregon 97205

Vinh Pham
Bank of the West
PO Box 1121
San Jose, California 95108-1121

RE: Portland Harbor Superfund Site RI/FS Trust Fund
Lower Willamette Group
Claim Certificate LWG-029

Dear Ms. Cora, Mr. Humphrey, and Mr. Pham;

At the request of the Lower Willamette Group, enclosed is Claim Certificate LWG-029 for the Portland Harbor Superfund Site Remedial Investigation and Feasibility Study Trust Fund. The purpose of the Claim Certificate is to request a payment from the Trust Fund for work performed under the US Environmental Protection Agency Settlement and Order as part of Section 26 of the Administrative Order on Consent for the Portland Harbor Superfund Site.

The total for Claim Certificate LWG-029 is \$168,484.58 with a payment to Anchor/QEA. The work detailed in Claim Certificate LWG-029 was performed by Anchor/QEA during December 2011 and January 2012. The attached Claim Certificate includes a summary of the payee amount, a description of the tasks performed, and a summary table from the payee.

If there are any questions regarding this Claim Certificate, please contact either Hans Feige of Feige & Associates at 503-543-9700 or Fred Wolf of Legacy Site Services at 253-535-7256.

Sincerely;

A handwritten signature in black ink, appearing to be "Hans Feige", written over a horizontal line.

Hans Feige
Feige & Associates, Inc.

Cc: Kelly Madalinski; Port of Portland
Bob Wyatt; Northwest Natural Gas
Kim Cox; City of Portland
Fred Wolf; Legacy Site Services
David Ashton; Port of Portland
Jennifer Woronets; Anchor QEA

Claim Certificate LWG-029
April 16, 2012

Certification

The following invoice is for Remedial Investigation and Feasibility Study activities performed at the Portland Harbor Superfund Site in accordance with the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study, Docket Number CERCLA 10-2001-0240. The purpose of this invoice is to request the Trustee to make a payment from the Trust Fund established by the Lower Willamette Group to pay for work performed for the Site. This invoice is for work that has been generally discussed with the US Environmental Protection Agency (EPA).

Summary of Activities

Anchor/QEA – December 2011 (see attached Table 1)

1) Definition of AOPCs/SMAs	
Final SMAs for FS Report	\$775.50
2) Disposal Site Screening	
Cost Feasibility Uncertainty Analysis for Alts.	\$2,271.00
3) Sediment Transport Analysis	
HST Hybrid Model Runs	\$458.00
4) ARAR Analysis and RAO Development	
RAOs Refinement	\$1,504.00
5) Construction Impacts Evaluation	
Final Impacts Evaluation (detailed alts)	\$1,582.40
6) Habitat Mitigation Requirement	
Revise Framework and Develop FS Appendix	\$3,109.80
7) Recontamination and Natural Recovery Evaluation	
Detailed Model Runs	\$22,237.00
8) Feasibility Study Report	
Write Upfront Sections (Source, RAOs, PRGs, SMAs)	\$110.00
Development and Screening Alts	\$543.00
Detailed Evaluation of Alts	\$2,068.00
Write End Sections (Conclusion, Flexible Alts., Sequence)	\$1,637.64
Appendices	\$3,820.18
Total	\$40,116.52

Anchor/QEA – January 2012 (see attached Table 2)

9) Definition of AOPCs/SMAs	
Final SMAs for FS Report	\$2,229.00
10) Disposal Site Screening	
Cost Feasibility Uncertainty Analysis for Alts.	\$4,071.10
11) Sediment Transport Analysis	
HST Hybrid Model Runs	\$4,748.00
12) ARAR Analysis and RAO Development	
RAOs Refinement	\$2,601.00

13) Construction Impacts Evaluation	
Final Impacts Evaluation (detailed alts)	\$14,290.48
14) Recontamination and Natural Recovery Evaluation	
Detailed Model Runs	\$32,186.26
15) Feasibility Study Report	
Develop Areas and Volumes	\$4,134.00
Write Upfront Sections (Source, RAOs, PRGs, SMAs)	\$974.86
Identification and Screening of Technologies	\$2,664.00
Development and Screening Alts	\$3,714.00
Detailed Evaluation of Alts	\$25,935.00
Appendices	\$5,342.40
Revise per LWG Comments	\$21,253.96
16) PRG and SMA Uncertainty Analysis	
Optimizing Remediation Areas Analysis	\$4,224.00

Total	\$128,368.06
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Certificate Total	<u>\$168,484.58</u>
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Descriptions of Activities

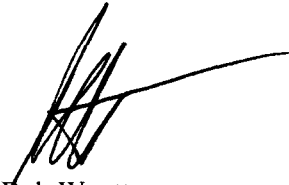
- 1) Definition of AOPCs/SMAs tasks included SMA calculations to support comment response.
- 2) Disposal Site Screening tasks included completing backup information to the Draft FS report.
- 3) Sediment Transport Analysis tasks included review of MNR comments and response to questions.
- 4) ARAR Analysis and RAO Development tasks included revising water screening based on new Oregon criteria.
- 5) Construction Impacts Evaluation tasks included review and response to LWG comments and developing backup information for the Draft FS report.
- 6) Habitat Mitigation Requirement tasks included review and respond to LWG comments.
- 7) Recontamination and Natural Recovery Evaluation tasks included uncertainty analysis model runs.
- 8) Feasibility Study Report tasks included issuing the Draft FS report to the LWG, revised hot spot analysis, analysis of LWG comments/response, post delivery internal reviews of the Draft FS, organization of backup materials, and development of the Draft FS appendices.
- 9) Definition of AOPCs/SMAs tasks included SMA evaluations and revisions.
- 10) Disposal Site Screening tasks included revisions to disposal sections of Draft FS report.
- 11) Sediment Transport Analysis tasks included revisions to the MNR evaluations in the Draft FS report.
- 12) ARAR Analysis and RAO Development tasks included continued revised water screening based on new Oregon criteria.
- 13) Construction Impacts Evaluation tasks included revised habitat and 404b1 analysis.
- 14) Recontamination and Natural Recovery Evaluation tasks included uncertainty analyses of model runs and MNR section revisions.

- 15) Feasibility Study Report tasks included revised hot analysis, analyses for LWG comment/response, and revisions to Draft FS sections.
- 16) PRG and SMA Uncertainty Analysis tasks included uncertainty analysis revisions.

Action Required

This certificate is being sent to both the EPA Attorney and the EPA Project Coordinator at their respective addresses in both electronic and print copy. The Trust details that if the EPA objects to any payment request in the Claim Certificate, the EPA must provide the LWG an Objection Notice within 30 days of the date in which this Certificate was delivered. If, after 30 days, no objection has been received, the payment shall be made to the LWG from the Trust by the Trustee.

Certification Signature

A handwritten signature in black ink, appearing to be 'Bob Wyatt', with a long horizontal line extending to the right.

Bob Wyatt
LWG Chairperson
Northwest Natural

Table 1

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Lower Willamette Group
Anchor OEA Progress Report - December 2011

Anchor OEA 2012 PS Budget Estimate for Known Tasks as of January 6, 2012
December 2011 through November 2012 (for known tasks as of January 2012)

No.	Task	SubTask	2012 Budget Estimate	Previous Amount Spent To Date	Amount Spent This Month	Amount Spent To Date	Remaining Budget	Percent of Budget Spent	Percent of Task Work Complete
4	Definition of AOPCs/SMAs	Refined AOPCs SMA Development AOPC/SMA Revision per EPA RA Comments Final SMAs for FS Report			\$775.50				
2a 2b 2c 2d 2e 2f 2g									
3	Disposal Site Screening	Coordination with Outside Entities Revised Screening Additional Information Development Cost/Feasibility Uncertainty Analysis for Alts.			\$2,271.00				
3a 3b 3c 3d 3e 3f 3g									
4	Sediment Transport Analysis	HST Erosional Areas/Cap Stability Runs HST Hybrid Model Runs Wind wave and Propwash Analysis Complete Combined Stability Analysis			\$458.00				
4a 4b 4c 4d 4e 4f 4g									
6	ARAR Analysis and RAO Development	RAOs Refinement ARARs Refinement			\$1,504.00				
6a 6b 6c 6d 6e									
8	Construction Impacts Evaluation	Preliminary Impacts evaluation (alts screening) Final Impacts evaluation (detailed alts)			\$1,582.40				
8a 8b 8c 8d 8e									
9	Habitat Mitigation Requirement	Framework development Interface with NOAA Revise Framework and Develop FS Appendix			\$3,109.80				
9a 9b 9c 9d 9e									
11	Recontamination & Natural Recovery Evaluation	Final Model Calibration Preliminary Model Runs Detailed Model Runs Sequencing Evaluation			\$22,237.00				
11a 11b 11c 11d 11e 11f 11g									
12	Feasibility Study Report	Develop Areas and Volumes Write UpFront Sections (Source, RAOs, PRGs, SMAs) Identification and Screening of Tech. Development and Screening Alts Detailed Evaluation of Alts Write End Sections (Conclusion, Flexible Alts, Sequence) Appendices Revise per LWG Comments			\$110.00 \$543.00 \$2,068.00 \$1,637.64 \$3,820.18				
12a 12b 12c 12d 12e 12f 12g 12h 12i 12j 12k									

Total: \$40,116.52

TABLE 2

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Lower Willamette Group
Anchor OEA Progress Report - January 2012

Anchor OEA 2012 FS Budget Estimate for Known Tasks as of January 6, 2012
December 2011 through November 2012 (for known tasks as of January 2012)

No.	Task	SubTask	2012 Budget Estimate	Previous Amount Spent To Date	Amount Spent This Month	Amount Spent To Date	Remaining Budget	Percent of Budget Spent	Percent of Task Work Complete
2	Definition of AOPCs/SMAs	Refined AOPCs							
2a		SMA Development							
2b		AOPC/SMA Revision per EPA RA Comments							
2c		Final SMAs for FS Report							
2d									
2v									
2z						\$2,229.00			
3	Disposal Site Screening	Coordination with Outside Entities							
3a		Revised Screening							
3b		Additional Information Development							
3c		Cost/Feasibility Uncertainty Analysis for Alts.							
3d									
3v									
3z						\$4,071.10			
4	Sediment Transport Analysis	HST Erosional Areas/Cap Stability Runs							
4a		HST Hybrid Model Runs							
4b		Wind wave and Proppwash Analysis Complete							
4c		Combined Stability Analysis							
4d									
4v									
4z						\$4,748.00			
6	ARAR Analysis and RAO Development	RAOs Refinement							
6a		ARARs Refinement							
6b									
6v									
6z						\$2,601.00			
8	Construction Impacts Evaluation	Preliminary impacts evaluation (alts screening)							
8a		Final impacts evaluation (detailed alts)							
8b									
8v									
8z						\$14,290.48			
11	Recontamination & Natural Recovery Evaluation	Final Model Calibration							
11a		Preliminary Model Runs							
11b		Detailed Model Runs							
11c		Sequencing Evaluation							
11d									
11v									
11z						\$32,186.26			
12	Feasibility Study Report	Develop Areas and Volumes							
12a		Write Upfront Sections (Source, RAOs, PRGs, SMAs)							
12b		Identification and Screening of Tech.							
12c		Development and Screening Alts							
12d		Detailed Evaluation of Alts							
12e									
12f		Write End Sections (Conclusion, Flexible Alts, Sequence)							
12g		Appendices							
12h		Revise per LWG Comments							
12v									
12z						\$5,342.40			
						\$21,253.96			

TABLE 2

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No.	Task	SubTask	2012 Budget Estimate	Previous Amount Spent To Date	Amount Spent This Month	Amount Spent To Date	Remaining Budget	Percent of Budget Spent	Percent of Task Work Complete
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17	PRG and SMA Uncertainty Analysis	Natural Neighbor Contouring Analysis							
17a		Impact of Non-detect on AQPC Mapping Analysis							
17b		Mapping of Alternate Key PRGs							
17c		Optimizing Remediation Areas Analysis							
17d		Coordination Task							
17e									
17f									
17g									
17h									
17i									
17j									
17k									
17l									
17m									
17n									
17o									
17p									
17q									
17r									
17s									
17t									
17u									
17v									
17w									
17x									
17y									
17z									
Total						\$4,224.00			

TOTAL: \$128,368.06